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Hearing Date/Time: November 27, 2018 at 10:00 am  
Objection Deadline: November 15, 2018 at 4:00 pm

Counsel to Sakar International, Inc.

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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SEARS HOLDINGS CORPORATION, et al.,  
Debtors.

Chapter 11  
Case No. 18-23538 (RDD)  
(Jointly Administered)

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**JOINDER OF SAKAR INTERNATIONAL INC. IN (I) THE RESPONSE  
OF ALLURE GEMS, LLC, WITH RESPECT TO DEBTORS' MOTION  
FOR AUTHORITY TO (A) OBTAIN POSTPETITION FINANCING,  
(B) USE CASH COLLATERAL, AND (C) GRANT CERTAIN PROTECTIONS  
TO PREPETITION SECURED PARTIES; AND (II) THE AMENDED  
LIMITED OBJECTION OF AMERICAN GREETINGS CORPORATION  
TO DEBTORS' MOTION FOR AUTHORITY TO (A) OBTAIN POSTPETITION  
FINANCING, (B) USE CASH COLLATERAL, AND (C) GRANT CERTAIN  
PROTECTIONS TO PREPETITION SECURED PARTIES**

Sakar International Inc. ("Sakar") hereby joins in (i) the response of Allure Gems, LLC (Dkt. No. 781) (the "Allure Response") to the Debtors' Motion For Authority To Obtain Postpetition Financing, (B) Use Cash Collateral, [and] (C) Grant Certain Protections To Prepetition Secured Parties (Dkt. No. 7) (the "Motion") filed by the above- captioned debtors

(the “Debtors”); and (ii) the to a limited extent in the Amended Limited Objection of American Greetings Corporation (“AGC”) to the Motion (Dkt. No. 733), and respectfully represents as follows:

**Reclamation Issues:**

1. Sakar, a vendor of various products to the Debtors, had lodged an informal objection concerning certain issues arising from its reclamation demand asserted in this case (Dkt. No. 260). Sakar believes that its informal objection to the Motion is resolved.
2. To the extent that the agreed-upon language is not reflected in the final form of order filed by the Debtors, Sakar submits this response so that it has preserved its right to file an objection prior to the hearing on the Motion or make an oral objection at the hearing.

**Consignment Issues**

3. Sakar had previously filed a limited objection with respect to the Debtors’ motion for approval of store closings and related relief (Dkt. No. 83) with respect to its rights as a consignment vendor and repeats and restates all of the statements made therein, herein.
4. Sakar joins in the Allure Response and the Amended Limited Objection of AGC to the Motion (AGC to the extent of seeking to preserve rights and claims against Bank of America or any other lender to the extent Bank of America or any other lender has taken, or been paid with, funds from the Debtors in which Sakar has a superior interest for the reasons stated in the AGC limited objection to the Motion and restates the arguments made therein as if made herein.

Dated: New York, New York  
November 16, 2018

Respectfully submitted,  
CKR LAW LLP

By: /s/ Edward L. Schnitzer  
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**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that on November 16, 2018, she caused a true and correct copy of the foregoing Joinder to be served electronically and by email upon all those identified in the Master Service List as of October 23, 2018 in accordance with this Court's Order Implementing Certain Notice and Case Management Procedures (the "Case Management Order") entered on October 17, 2018 (Docket # 139). I hereby further certify that pursuant to the Case Management Order and the local rules, hard copies of the foregoing Joinder were delivered via overnight mail to (i) the Honorable Robert D. Drain, and (ii) the United States Trustee's Office.

/s/ Maura I. Russell